

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11009REK

HARVEY MARLIN *
*
v. *
*
DANVERS DEMOULAS *
MARKET BASKET *

JOINT STATEMENT

PROPOSED DISCOVERY PLAN

1. All interrogatories and requests for production of documents shall be served on or before January 15, 2006.
2. All depositions (except *de bene esse*) and expert depositions shall be concluded on or before April 30, 2006.
3. Joinder of additional parties shall be sought on or before May 15, 2006.
4. Any motion pursuant to Fed. R. Civ. P. 56 shall be brought on or before September 15, 2006.

Counsel hereby certify that they have conferred with the parties relative to the use of alternative dispute resolution and the parties are amenable to said resolution.

Dated:

The Plaintiff,
By his attorney,
Joseph G. Abromovitz, P.C.

s/Joseph G. Abromovitz

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The Defendant,
By their attorney,
Curtin, Murphy & O'Reilly, P.C.

s/Crisann Leal

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